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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Lighting Defense Group LLC,
Plaintiff

v.

Shanghai SANSEI Electronic
Engineering Co., Ltd.,
Defendant

Case No. 2:22-cv-01476-SMB

**FIRST AMENDED COMPLAINT
FOR PATENT INFRINGEMENT**

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT

Plaintiff, Lighting Defense Group (“LDG”), hereby brings this first amended complaint against Defendant, Shanghai SANSEI Electronic Engineering Co., Ltd. (“Shanghai SANSEI”), for infringement of U.S. Patent Nos. 8,256,923 (“the ’923 patent”), 9,163,807 (“the ’807 patent”), 7,874,700 (“the ’700 patent”), and 8,939,608 (“the ’608 patent”) and alleges as follows:

BACKGROUND

1. LDG is the owner of more than 40 issued U.S. patents and pending patent applications relating to lights and lighting. The principals of LDG have consulted on lighting design and implementation issues for a variety of companies, including Costco Wholesale, Motorola, American Express, Simon Properties, Prologis, and Crate & Barrel. Additionally, LDG principals have designed and patented lighting products that have been manufactured and sold globally by major manufacturers, including Thomas & Betts/ABB, Acuity, Cooper Lighting/Signify, and Valmont Industries.

2. LDG’s patent portfolio encompasses innovative heat management technology for high efficiency lighting products, including various aspects and improvements relating to light emitting diode (LED) lighting technology. The LDG patent portfolio describes and claims technologies that permit more effective heat management for LED lighting products that may be used indoors or outdoors, including in homes, offices, warehouses, retail spaces, and similar spaces. This technology improves the efficiency of lighting through effective heat dispersion, in turn allowing the use of more efficient, longer lasting, and high power LED lighting products and solutions.

3. LDG is the owner of U.S. Patent No. 8,256,923 (“the ’923 patent”), titled Heat Management for a Light Fixture with an Adjustable Optical Distribution. The ’923 patent issued on September 4, 2012. A true and correct copy of the ’923 patent is attached as Exhibit 1 hereto.

4. LDG is the owner of U.S. Patent No. 9,163,807 (“the ’807 patent”), titled Heat Management for a Light Fixture with an Adjustable Optical Distribution. The ’807

1 patent issued on October 20, 2015. A true and correct copy of the '807 patent is attached
2 as Exhibit 2 hereto.

3 5. LDG is the owner of U.S. Patent No. 7,874,700 ("the '700 patent"), titled
4 Heat Management for a Light Fixture with an Adjustable Optical Distribution. The '700
5 patent issued on January 25, 2011. A true and correct copy of the '700 patent is attached
6 as Exhibit 3 hereto.

7 6. LDG is the owner of U.S. Patent No. 8,939,608 ("the '608 patent"), titled
8 Heat Management for a Light Fixture with an Adjustable Optical Distribution. The '608
9 patent issued on January 27, 2015. A true and correct copy of the '608 patent is attached
10 as Exhibit 4 hereto.

11 7. On or about June 26, 2020, LDG sent a letter to Bishou Chen, Legal
12 Representative for Shanghai SANSI. The June 26, 2020 letter identified the '923, '807,
13 '700, and '608 patents.

14 8. The June 26, 2020 letter stated that Shanghai SANSI required a license to
15 the '923, '807, '700, and '608 patents in order to avoid infringement by the making, using,
16 selling, importing or otherwise offering certain LED lighting products identified in that
17 letter, including at least the following: the SANSI C21BB-WE Omnidirectional Light
18 Bulb, SANSI C21BB-TE26 UV Light Bulb, SANSI C21BB-QE Smart RGB Light Bulb,
19 SANSI C21BB-TE26/27 Plain Light Bulb, SANSI C21BB-RE Dimmable Light Bulb,
20 SANSI C21BB-UE Light Bulb, SANSI C21GL-CE26/27 Full Spectrum Glow Light,
21 SANSI C21GL-AE26 Full Cycle Glow Light, SANSI C21GL-DE26 Full Spectrum Glow
22 Light, SANSI C21GL-CE26/27 Full Spectrum Glow Light, SANSI C21GL-AE26-
23 Flowering Glow Light, SANSI C21BB-ZE39/E40 High Bay Light, and BR30 Non-
24 Dimmable LED Light Bulb.

25 9. A copy of the June 26, 2020 letter is attached hereto as Exhibit 5. Copies of
26 the exemplary claim charts showing infringement by SANSI lighting products of the LDG
27 '923, '807, '700, and '608 patents are attached hereto as Exhibits , 6, 7, 8, 9, 10, 11, 12
28 and 13.

1 10. On or about August 27, 2020, Shanghai SANSE, through its outside counsel
2 Xiaofei Xue, responded to LDG's June 26, 2020 letter in which Shanghai SANSE
3 contended that it did not infringe any of the identified LDG patents. Shanghai SANSE also
4 contended in its August 27, 2020 letter that the claims of LDG patents were invalid, and
5 took the position that "a license of the LDG Patents is highly unnecessary." A copy of the
6 August 27, 2020 letter from Xiaofei Xue is attached hereto as Exhibit 14.

7 11. As a result of Shanghai SANSE's refusal to take a license or even enter into
8 licensing discussions any of the LDG patents, LDG filed a complaint with Amazon.com
9 through Amazon.com's patent evaluation procedures on June 1, 2021, regarding
10 infringement by SANSE lighting products on claim 15 of U.S. Patent No. 8,939,608.

11 12. Following the filing of the complaint, LDG received a response from
12 Amazon.com stating: "We have received your notice of infringement. Due to the nature of
13 your notice, we have transferred it to a specialized team for review. Responses may be
14 delayed as a result."

15 13. Following a review by Amazon, upon information and belief, the accused
16 Shanghai SANSE products were de-listed by Amazon between June 2 and June 9, 2021.

17 14. On June 10, 2021, LDG received an email from Shanghai SANSE stating
18 that Shanghai SANSE demanding that LDG withdraw its Amazon.com complaint. A copy
19 of the June 10, 2021 email from Shanghai SANSE is attached hereto as Exhibit 15. LDG
20 did not withdraw its complaint.

21 15. LDG nevertheless continued its discussions with Shanghai SANSE regarding
22 its infringement of the LDG patents and the Amazon.com complaint. On June 23, 2021,
23 LDG received an email from Ethan Ma, counsel for Shanghai SANSE, where he
24 confirmed, "I am writing on behalf of our client Shanghai SANSE Electronic Engineering
25 Co., Ltd. ("SANSE") in relation to the complaint you filed with Amazon against our
26 client." A copy of the June 23, 2021 email from Mr. Ma is attached hereto as Exhibit 16.

27 16. On June 30, 2021, SANSE LED Lighting, Inc. ("SANSE LED") filed a
28 complaint for declaratory judgment against LDG in this District seeking a declaration that

1 U.S. Patent No. 8,939,608 is not infringed and/or is invalid. *SANSI LED Lighting, Inc. v.*
2 *Lighting Defense Group, LLC*, Case No. 2:21-cv-001147-DWL (U.S. District Court for
3 the District of Arizona). SANSI LED Lighting also asserted various state law tort claims.

4 17. Upon information and belief, SANSI LED is a wholly owned subsidiary of
5 Shanghai SANSI Electronic Engineering Co., Ltd.

6 18. On information and belief, SANSI LED provided its complaint for
7 declaratory judgment to Amazon. Following the delivery of the complaint to Amazon,
8 consistent with Amazon's procedures, Amazon re-listed all of the SANSI LED lighting
9 products that it had previously de-listed, pending the outcome of the declaratory
10 judgement action filed by SANSI LED.

11 19. On September 7, 2021, LDG, through counsel, wrote to SANSI LED to
12 identify "a significant amount of false information in the Complaint." On September 15,
13 2021, SANSI LED filed its First Amended Complaint.

14 20. Following the filing of the amended complaint, LDG moved to dismiss the
15 state law tort claims under Fed. R. Civ. P. 12(b)(6). *See* Dkt. 20. On April 29, 2022, Judge
16 Dominic Lanza issued a "tentative ruling" granting LDG's motion to dismiss the "tort-
17 based" claims. *See* Dkt. 29. LDG's motion was set for hearing on June 7, 2022.

18 21. On June 1, 2022, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), SANSI LED
19 filed a notice of voluntary dismissal without prejudice of its declaratory judgment
20 complaint.

21 22. On June 8, 2022, LDG again filed a complaint with Amazon.com and
22 submitted to its Amazon Patent Evaluation Express Program, asserting claim 15 of the
23 '608 patent as to certain SANSI LED lighting products offered on Amazon.com. As a
24 requirement of the submission process, LDG sent Amazon a signed Amazon Patent
25 Evaluation Express Agreement (the "APEX Agreement").

26 23. On information and belief, sometime between June 8 and June 29, 2022,
27 SANSI LED voluntarily chose to submit to the Amazon Patent Evaluation Express
28 Program and submitted a signed APEX Agreement to Amazon.

1 24. On information and belief, between June 29 and July 7, 2022, Amazon
2 appointed an independent third-party arbiter to act as a Neutral Evaluator in the APEX
3 program to review LDG's patent infringement claim against SANSI's product listings on
4 Amazon.com and to determine whether the patent covers the product listings.

5 25. Between July 13, 2022, and continuing through August 17, 2022, the full
6 APEX procedure for LDG and SANSI LED took place, which included briefing from both
7 sides, including the submission of exhibits and other materials seeking to establish or
8 dispute infringement by the SANSI products. In this Amazon APEX proceeding, SANSI
9 LED was represented by the same Orrick Harrington counsel who (i) represented SANSI
10 LED in its first, subsequently dismissed declaratory judgment complaint against LDG,
11 (ii) represent SANSI LED and SANSI Smart in their new declaratory judgment action,
12 and (iii) represented Shanghai SANSI in the aforementioned negotiations.

13 26. On August 31, 2022, following a review of the submissions from LDG and
14 SANSI LED, the Neutral Evaluator independently engaged by Amazon issued a decision
15 in which the Neutral Evaluator concluded that the SANSI LED lighting products likely
16 infringed claim 15 of the '608 patent.

17 **PARTIES**

18 27. LDG is a Delaware limited liability company with its principal place of
19 business at 4260 North Brown Avenue, Suite #8, Scottsdale, AZ 85251.

20 28. Upon information and belief, Shanghai SANSI Electronic Engineering Co.,
21 Ltd. is a Chinese company with a principal place of business located at No. 1280, Shuying
22 Rd., Minhang District, Shanghai, China.

23 29. Upon information and belief, Shanghai SANSI is the parent company of
24 SANSI LED and SANSI Smart.¹

25 30. Upon information and belief, Shanghai SANSI designs and manufactures

26 ¹ Although, according to California Secretary of State business records, SANSI Smart is an active
27 corporation in good standing, it does not appear to be an operating company. Its principal address
28 and mailing address is a three-bedroom single family home located in a residential neighborhood
in Fremont, California.

1 LED lighting products for importation into the United States and distribution or sale
2 through its U.S. affiliates, SANSEI LED and SANSEI Smart, as well as through other retail
3 outlets such as Amazon.com, Walmart, and Home Depot.

4 **JURISDICTION AND VENUE**

5 31. This Court has subject matter jurisdiction under 38 U.S.C. § 1331 and/or
6 1338(a), because this complaint arises under the federal patent laws of the United States.

7 32. Shanghai SANSEI is subject to personal jurisdiction in this Court because it
8 commits and has committed acts within this District giving rise to this action and has
9 established minimum contacts with the forum state of Arizona relating to and arising from
10 LDG's claims of infringement. Specifically, Shanghai SANSEI, which markets itself as a
11 company with global reach, directs or controls the marketing, shipment, and sale of the
12 accused infringing products in the United States, including in Arizona, through its
13 distributions channels, including its U.S. affiliates.

14 33. On information and belief, Shanghai SANSEI established SANSEI LED in
15 2017 to facilitate the distribution and sale of its accused infringing products throughout
16 the United States. Attached as Exhibit 17 is the information available about SANSEI LED
17 through the California Secretary of State's business search, indicating that it was
18 established in 2017. However, prior to the filing of LDG's complaint, SANSEI LED held
19 itself out on its website as having been founded in 1993, and its "About Us" webpage
20 parroted Shanghai SANSEI's "About Us" webpage. Attached as Exhibit 18 is the web
21 capture of Shanghai SANSEI's "About Us" webpage (<https://www.sansi.com/about>;
22 accessed 1/11/2023). Attached as Exhibit 19 is the web capture of SANSEI LED's "About
23 Us" web page, as it existed on May 27, 2022
24 (<https://web.archive.org/web/20220527061513/https://www.sansiled.com/pages/about-us>;
25 accessed 1/11/2023).² Below are excerpts from both "About Us" webpages showing the
26

27 ² SANSEI LED has since scrubbed its website of connections to Shanghai SANSEI, and its "About
28 Us" page currently has no content (<https://www.sansiled.com/pages/about-us>; accessed
1/11/2023).

identical language, indicating that Shanghai SANSI and SANSI LED do not view themselves as separate companies.

Shanghai SANSI “About Us”:

Since its founding in 1993, SANSI has been dedicated to technological innovation in a wide range of LED applications, from commercial displays to home lighting. We fully integrate product design, production, sales, installation, and customer support in our effort to provide affordable, state-of-the-art LED technology. With over 500 in-house engineers, 2500 employees, and three advanced factories, SANSI has reached over 40 nations on five continents, and continues to grow. Having successfully launched dozens of cutting-edge projects, SANSI's mission is to raise the bar for LED applications.

SANSI possesses an abundance of technological research knowledge that leaps and bounds above that of its close competitors. Our research results speak for themselves. To date, SANSI has applied for 372 domestic and foreign patents, and currently holds 246 approved patents, including 22 international patents. SANSI has participated in the drafting of 29 official standards and specifications for China's Ministry of Public Security and Ministry of Communications, The China Solid State Lighting Alliance and more.

Innovative, Sustainable, Committed. Since its founding in 1993, SANSI has devoted itself to creating the ultimate LED display, lighting environment and smart traffic. SANSI's success is directly derived from persistence, perseverance and teamwork. As Henry Ford said, “Coming together is a beginning; keeping together is progress; working together is success”. Our dedicated employees will continue working together towards greater mutual success.

SANSI LED “About Us”:

Since its founding in 1993, SANSI has been dedicated to technological innovation in a wide range of LED applications, from commercial displays to home lighting. We fully integrate product design, production, sales, installation, and customer support in our effort to provide affordable, state-of-the-art LED technology. With over 500 in-house engineers, 2000 employees, and three advanced factories, SANSI has reached over 40 nations on five continents, and continues to grow. Having successfully launched dozens of cutting-edge projects, SANSI's mission is to raise the bar for LED applications.

As of 2017, SANSI employs an R&D force of over 500 engineers. We devote considerable resources to developing new materials and technologies in the fields of computer hardware and software, digital communications, automation, photoelectric display, mechanical structure, and more. SANSI possesses a wealth of technological research knowledge leaps and bounds above that of its nearest competitors. Our research results speak for themselves. To date, SANSI has applied for 372 domestic and foreign patents, and currently holds 246 approved patents, including 22 international patents. SANSI has participated in the drafting of 29 official standards and specifications for China's Ministry of Public Security and Ministry of Communications, The China Solid State Lighting Alliance, and more.

For the past 28 years, SANSI has devoted itself to creating the ultimate LED display and lighting environment. SANSI's success is directly derived from persistence, perseverance and teamwork. As Henry Ford said, “Coming together is a beginning; keeping together is progress; working together is success”. Our dedicated employees will continue working together towards greater mutual success. SANSI creates valuable solutions for our customers, a supportive home for our employees, and a sustainable presence for our environment.

34. In addition, SANSE LED's current "Shipping & Delivery" webpage states: "We offer worldwide shipping, currently, we have warehouses in US, UK, EU, CA, for the rest of the world, we will ship your order from *our factory in China* directly." (emphasis added) (<https://www.sansiled.com/pages/shipping-delivery?ref=PCmenu>; accessed 1/11/2023). Attached as Exhibit 20 is a web capture of SANSE LED's "Shipping & Delivery" webpage. The webpage also states that, ". . . if you're willing to pay the extra shipping cost, we could ship out from *our factory in China* directly." (emphasis added). This language indicates that Shanghai SANSE and SANSE LED are one in the same, with SANSE LED merely existing to coordinate warehousing and shipping in Europe and North America.

35. Shanghai SANSE has distributed and sold its accused infringing products directly into the United States market or sold to SANSE LED with the expectation and intention that SANSE LED would distribute the products throughout the United States, including in Arizona. Indeed, printed on Shanghai SANSE's LED lighting products is a representation that the products "conform" to the applicable safety standards of Underwriters Laboratories ("UL"), standards that are routinely applied to electronics products distributed in the United States. The UL conformity representation stamped on Shanghai SANSE's model C21BB-XE26-20W lightbulb is shown below:



36. In fact, Shanghai SANSEI distributes infringing LED lighting products throughout the United States, including in this District. On its website, <https://www.sansi.com>, Shanghai SANSEI offers its LED lighting products through www.sansiled.com, as well as through retailers including Amazon US, Walmart, eBay, Home Depot, Lowes, and Newegg. A screenshot of the website for Shanghai SANSEI is attached hereto as Exhibit 21 (www.sansi.com; accessed 8/10/2022). Below is an excerpt from that website showing Shanghai SANSEI's name and address and "E-Commerce" links to SANSIled.com, Amazon US, Walmart, eBay, and Home Depot.

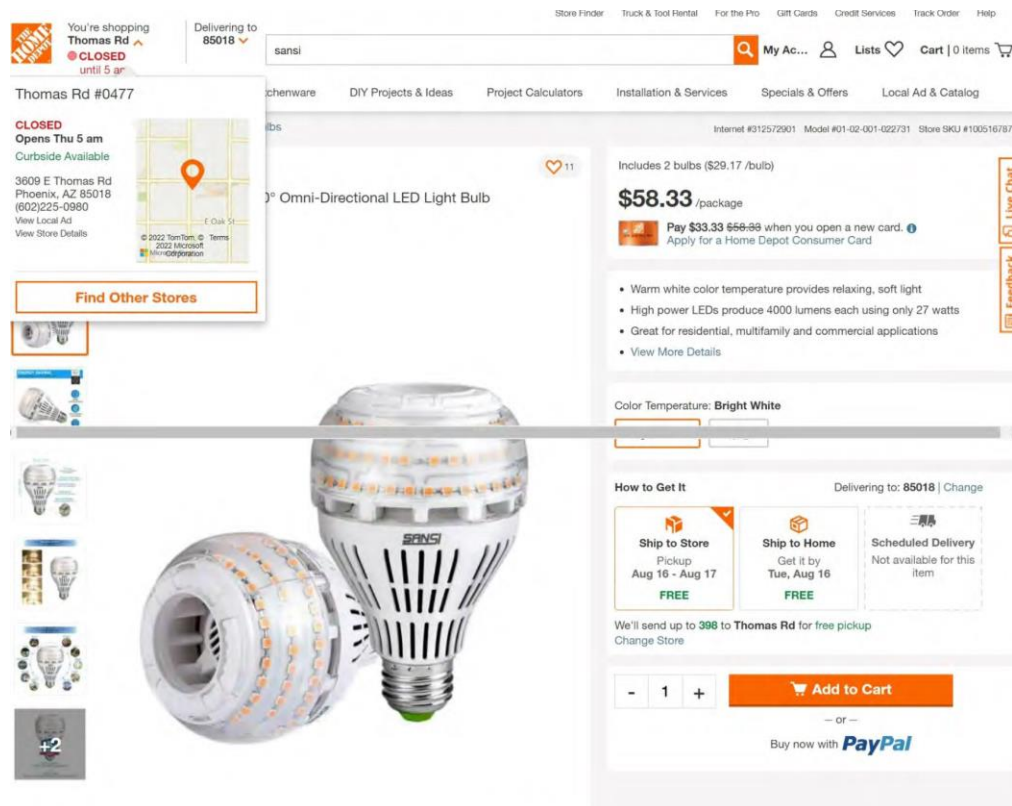
Product	Case
LED Display	LED Display
LED Lighting	LED Lighting
Integrated Intelligent System	Integrated Intelligent System
Solution	E-Commerce
LED Display	sansiled.com
LED Lighting	Amazon US
Integrated Intelligent System	Walmart
	eBay
	Home Depot
Shanghai Sansi Electronic Engineering Co., Ltd. No.1280, Shuying Rd, Minhang District, Shanghai, China overseas@sansitech.com +86-021-54883434 +86-021-54883432 +86-021-54883445	

37. The excerpt above from the Shanghai SANSEI website provides an "E-Commerce" link to the retailer Home Depot. Clicking on that link to Home Depot will take the potential consumer to the Home Depot website. If the potential consumer's location is not known, the website will prompt the consumer for his or her location. A potential consumer located in Scottsdale, Arizona, within this District, is provided SANSEI LED lighting products that can be purchased, delivered, or picked up from the Home

Depot retail store located in Scottsdale, Arizona as well as in nearby cities, including Phoenix, Arizona, within this District. Attached as Exhibit 22 is a website showing “search results for SANSI at The Home Depot” which identifies four different Home Depot stores in Scottsdale, Phoenix, and Mesa—all within this District—where various SANSI branded LED lighting products may be purchased.

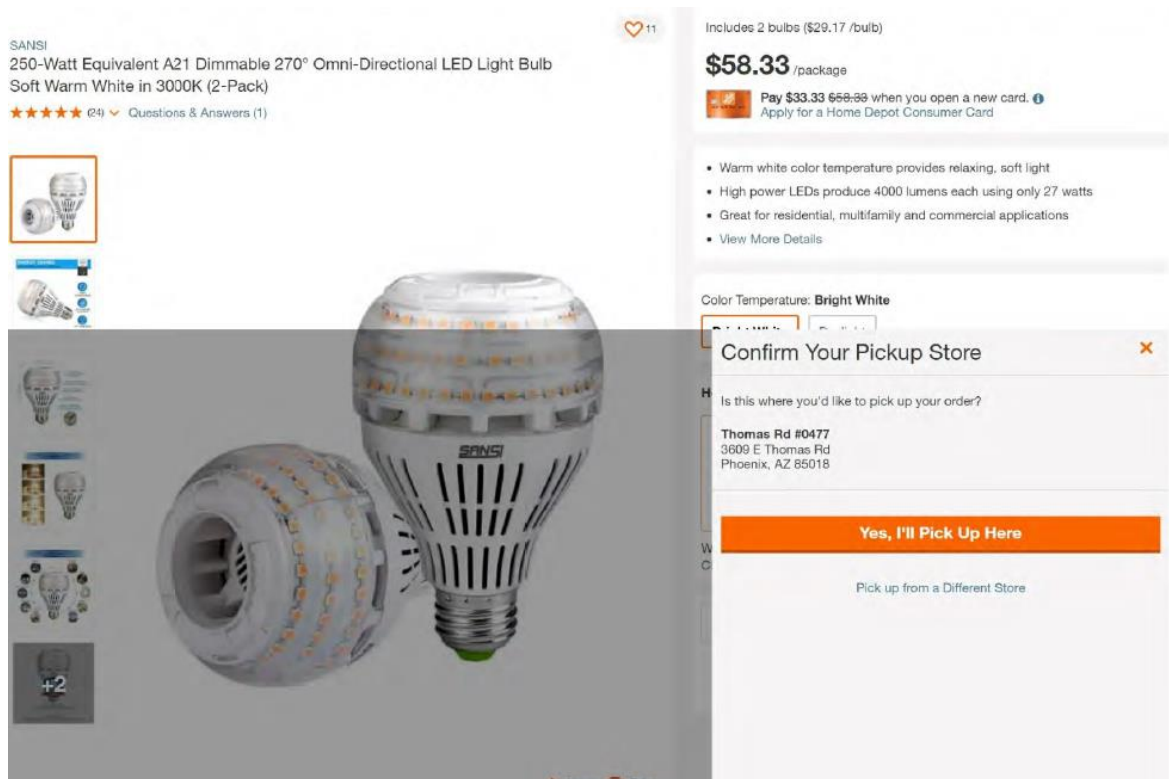
(www.homedepot.com/s/SANSI; accessed 8/10/2022.) One of the Home Depot stores is identified as Thomas Rd #0477 and is located at 3609 E. Thomas Road, Phoenix, Arizona 85018, located in this District.

38. Attached as Exhibit 23 is a website from The Home Depot showing a SANSI 250-Watt Equivalent A21 Dimmable Omni-Directional LED Light Bulb Soft Warm White in 3000k (2-Pack) that can be shipped for pickup to the Thomas Rd #0477 Home Depot store in Phoenix, Arizona. (accessed 8/10/2022.) An excerpt from this website is shown below:




39. The consumer can then select the SANSI A21 LED bulb for purchase and


“Pick Up In Store” at the Thomas Rd #0477 Home Depot store in Phoenix, Arizona. Attached as Exhibit 24 is a website showing the selection of the above identified SANSI 250-Watt Equivalent A21 LED bulb and a link to confirm the pickup store at the Thomas Rd #0477 Home Depot store in Phoenix, Arizona. (accessed 8/10/2022.)



40. The customer can then purchase the above identified SANSI 250-Watt Equivalent A21 LED bulb for pickup at the Thomas Rd Rd #0477 Home Depot store in Phoenix, Arizona. Attached as Exhibit 25 is a website page showing the Home Depot Secure Checkout for the order of the SANSI 250-Watt Equivalent A21 LED bulb for pickup at the Thomas Rd Rd #0477 Home Depot store in Phoenix, Arizona. (accessed 8/10/2022.) Below is an excerpt from this website page showing the order for pickup of the SANSI 250-Watt Equivalent A21 LED bulb at the Thomas Rd Rd #0477 Home Depot store in Phoenix, Arizona.



Secure Checkout


[Edit Cart \(1\)](#)

1. Contact Information

First Name

Last Name

Phone Number

☐ Text me when my order is ready.

Home Depot will send you a text message when your order is ready for pickup. Message and data rates may apply and texts may be sent between the hours of 8:00 am and 9:00 pm. Privacy Policy at www.homedepot.com/c/Privacy_Security, Full terms

☐ Will someone else pick it up?


Continue

2. Store Pickup

3. Payment Method

Your Order


\$63³⁵



Pick Up In Store

See below for pick up availability. **FREE**

Thomas Rd Store
 3609 E Thomas Rd, Phoenix, AZ 85018 | (602)225-0980
[Curbside Available](#)



SANSI 250-Watt Equivalent A...

Qty : 1

Expected pick up by
Aug 16 - Aug 17

\$58.33

Subtotal	\$58.33
Pick Up In Store	FREE
Estimated Sales Tax*	\$5.02
Apply Tax Exempt ID	
Total	\$63³⁵

Have a promo code?

41. Shanghai SANSI further distributes and sells accused LED lighting products through retailers located in Arizona, such as Lowes and Home Depot, where the LED lighting products are contained in packaging identifying “Shanghai Sansi Electrical Engineering Co., Ltd.,” as shown below:



42. As allege above, Shanghai SANSI also is subject to personal jurisdiction in this District. Through SANSI LED and SANSI Smart, Shanghai SANSI imports accused infringing products into the United States for distribution throughout the United States, including distribution and sale in Arizona.

43. For example, Shanghai SANSI provided links on its website to retailers, such as Home Depot, Walmart, Amazon.com, and eBay, as well as to SANSI LED. Through the links to retailers such as Home Depot and Amazon.com, Shanghai SANSI knowingly and intentionally distributed accused infringing products throughout the United States, including in Arizona. Through SANSI LED and retailers such as Home Depot and Amazon.com, Shanghai SANSI placed accused infringing products into the stream of commerce, through established distribution channels and brick-and-mortar retail stores, like Home Depot, located nationwide, as well as through the nationwide online

1 distribution channels of Amazon.com, which the expectation that such products would be
2 purchased by consumers in Arizona.

3 44. LDG's infringement claims in this complaint against Shanghai SANSE arise
4 out of and are related to Shanghai SANSE's activities directed to residents of Arizona,
5 including Shanghai SANSE's importation of accused infringing products into the United
6 States and distribution of such accused infringing products throughout the United States,
7 including into Arizona, as described above.

8 45. In addition, on information and belief, Shanghai SANSE has purposefully
9 directed two declaratory judgment lawsuits to be brought in this District against LDG, a
10 company with its principal place of business in this District, and Shanghai SANSE did so
11 with the knowledge that LDG is a company located in Arizona.

12 46. Shanghai SANSE has purposefully directed activities to this District and has
13 purposefully availed itself of doing business in Arizona and with Arizona residents.
14 Shanghai SANSE has also purposefully directed activities to this District by directing its
15 wholly owned subsidiaries to file declaratory judgment actions in this District relating to
16 the same infringement claims brought by LDG against the same accused products.

17 47. In addition, throughout the parties' negotiations in 2020 and 2021, Shanghai
18 SANSE understood that LDG's principal place of business is in Arizona and therefore
19 knew that the harm and injury stemming from its patent infringement would occur in
20 Arizona.

21 48. Given that Shanghai SANSE's wholly owned subsidiaries, SANSE LED and
22 SANSE Smart, have filed a declaratory judgment action against LDG, a resident of this
23 District, seeking adjudication of LDG's patent infringement claims, this District has an
24 interest in adjudicating the dispute between LDG and Shanghai SANSE here, in this
25 District, where it may be conveniently and effectively adjudicated.

26 49. Venue is proper in this District for LDG's claims of patent infringement
27 because Shanghai SANSE is a foreign corporation and may be sued in any judicial district
28 pursuant to 28 U.S.C. § 1391(c)(3).

COUNT ONE

Infringement of U.S. Patent No. 8,256,923 (“the ’923 patent”)

50. LDG incorporates by reference Paragraphs 1 through 49 as if fully set forth herein.

51. Shanghai SANSI, without authorization from LDG, makes, uses, sells, or offers for sale within the United States, including in this District, or imports into the United States, LED lighting products that infringe one or more claims of the ’923 patent. These infringing LED lighting products include LED lighting products in the categories of “A” shape (or “A” line) products (such as A19 and A21 LED light bulbs), “grow lights,” and directional lights (such as BR30 or PAR30 light bulbs).

52. Shanghai SANSI’s infringing LED lighting products include at least following products identified in LDG’s June 26, 2020 letter: (1) SANSI C21BB-WE Omni-directional Light Bulb, (2) SANSI C21BB-TE26 UV Light Bulb, (3) SANSI C21BB-QW Smart RGB Light Bulb, (4) SANSI C21BB-TE26/27 Plain Light Bulb, (5) SANSI C21BB-RE Dimmable Light Bulb, (6) SANSI C21BB-UE Light Bulb, (7) SANSI C21GL-CE26/27 Full Spectrum Glow Light, (8) SANSI C21GL-AE26 Pull Cycle Glow Light, (9) SANSI C21GL-DE26 Pull Spectrum Glow Light, (10) SANSI C21GL-AE26 Flowering Glow Light, (11) SANSI C21BB-ZE39/E40 High Bay Light, and (12) BR30 Non-Dimmable LED Light Bulb. Exemplary claim charts provided to Shanghai SANSI in June 2020 show Shanghai SANSI’s infringement of each and every element of at least one claim of the ’923 patent. *See Exhibits 5, 6 and 7.*

53. In addition, attached hereto as Exhibit 26 is an exemplary chart showing how a SANSI A21 LED bulb, product number C21BB-VE26-18W, 18W (150 Watt Equivalent) A21 LED bulb, 2500 lumens, 5000k daylight, E26 base, meets each and every element of at least claim 1 of the ’923 patent.

54. Attached hereto as Exhibit 27 is another exemplary chart showing how a SANSI LED grow light—SANSI C21GL-CE26-24W—meets each and every element of at least claim 1 of the ’923 patent.

55. Attached hereto as Exhibit 28 is yet another exemplary chart showing how a SANSI A21 LED bulb, 27W (250 Watt Equivalent) A21 Omni-Directional Ceramic LED light bulb, 4000 lumens, 5000k daylight, E26 Medium Screw Base, light meets each and every element of at least claim 1 of the '923 patent.

56. Attached hereto as Exhibit 29 is another exemplary chart showing how SANSI 10W, 20W, 30W, and 40W adjustable head clip-on LED grow light meets each and every element of at least claim 17 of the '923 patent.

57. By the foregoing acts, Shanghai SANSEI has directly infringed, and continues to directly infringe, literally or under the doctrine of equivalents at least one claim of the '923 patent in violation of 35 U.S.C. § 271.

58. Shanghai SANZI has had constructive knowledge of the '923 patent since at least September 4, 2012, the date the '923 patent issued.

59. Shanghai SANSEI has had actual knowledge of the '923 patent as least through LDG's letter dated June 26, 2020, which provided notice of the '923 patent and its infringement by at least the above identified infringing products.

60. Shanghai SANSEI has been on actual notice of infringement of the '923 patent consistent with the requirements of 35 U.S.C. § 287(a) since at least June 26, 2020.

61. Shanghai SAN SI's infringement of the '923 patent has been and continues to be knowing, willful, deliberate, and intentional, as Shanghai SAN SI has continued its acts of infringement by continuing to make, use, sell, offer for sale, or import into the United States, one or more of the foregoing identified Accused Products after being placed on constructive and actual notice of the '923 patent and its infringement, thus acting in reckless disregard of its infringement of and LDG's rights in the '923 patent.

62. Such acts of infringement have caused damages to LDG in an amount to be proven at trial, but in no event less than a reasonable royalty.

COUNT TWO

Infringement of U.S. Patent No. 9,163,807 (“the ’807 patent”)

63. LDG incorporates by reference Paragraphs 1 through 62 as if fully set forth

1 herein.

2 64. Shanghai SANSE, without authorization from LDG, makes, uses, sells, or
3 offers for sale within the United States, including in this District, or imports into the
4 United States, LED lighting products, including at least the following LED lighting
5 products: (1) SANSE C21BB-WE Omni-directional Light Bulb, (2) SANSE C21BB- TE26
6 UV Light Bulb, (3) SANSE C21BB-QW Smart RGB Light Bulb, (4) SANSE C21BB-
7 TE26/27 Plain Light Bulb, (5) SANSE C21BB-RE Dimmable Light Bulb, (6) SANSE
8 C21BB-UE Light Bulb, (7) SANSE C21GL-CE26/27 Full Spectrum Glow Light, (8)
9 SANSE C21GL-AE26 Pull Cycle Glow Light, (9) SANSE C21GL-DE26 Pull Spectrum
10 Glow Light, (10) SANSE C21GL-AE26 Flowering Glow Light, (11) SANSE C21BB-
11 ZE39/E40 High Bay Light, and (12) BR30 Non-Dimmable LED Light Bulb. Exemplary
12 claim charts provided to Shanghai SANSE in June 2020 show its infringement of each and
13 every element of at least one claim of the '807 patent. *See Exhibits 5, 8 and 9.*

14 65. In addition, attached hereto as Exhibit 30 is an exemplary chart showing
15 how SANSE 27W (250 Watt Equivalent) A21 Omni-Directional Ceramic LED Light Bulb,
16 4000 Lumens, 5000K Daylight, E26 Medium Screw Base Floodlight Bulb—meets each
17 and every element of at least claims 14 of the '807 patent and, therefore, infringes at least
18 those claims of the '807 patent.

19 66. By the foregoing acts, Shanghai SANSE has directly infringed, and
20 continues to directly infringe, literally or under the doctrine of equivalents at least one
21 claim of the '807 patent in violation of 35 U.S.C. § 271.

22 67. Shanghai SANSE has had constructive knowledge of the '807 patent since at
23 least October 20, 2015, the date the '807 patent issued.

24 68. Shanghai SANSE has had actual knowledge of the '807 patent as least
25 through LDG's letter dated June 26, 2020, which provided notice of the '807 patent and
26 its infringement by at least the above identified infringing products.

27 69. Shanghai SANSE has been on actual notice of infringement of the '807
28 patent consistent with the requirements of 35 U.S.C. § 287(a) since at least June 26, 2020.

70. Shanghai SANSE's infringement of the '807 patent has been and continues to be knowing, willful, deliberate, and intentional, as Shanghai SANSE has continued its acts of infringement by continuing to make, use, sell, offer for sale, or import into the United States, one or more of the foregoing identified Accused Products after being placed on constructive and actual notice of the '807 patent and its infringement, thus acting in reckless disregard of its infringement of and LDG's rights in the '807 patent.

71. Such acts of infringement have caused damages to LDG in an amount to be proven at trial, but in no event less than a reasonable royalty.

COUNT THREE

Infringement of U.S. Patent No. 7,874,700 ("the '700 patent")

72. LDG incorporates by reference Paragraphs 1 through 71 as if fully set forth herein.

73. Shanghai SANSE, without authorization from LDG, makes, uses, sells, or offers for sale within the United States, including in this District, or imports into the United States, LED lighting products, including at least the following LED lighting products: (1) SANSE C21BB-WE Omni-directional Light Bulb, (2) SANSE C21BB-TE26 UV Light Bulb, (3) SANSE C21BB-QW Smart RGB Light Bulb, (4) SANSE C21BB-TE26/27 Plain Light Bulb, (5) SANSE C21BB-RE Dimmable Light Bulb, (6) SANSE C21BB-UE Light Bulb, (7) SANSE C21GL-CE26/27 Full Spectrum Glow Light, (8) SANSE C21GL-AE26 Pull Cycle Glow Light, (9) SANSE C21GL-DE26 Pull Spectrum Glow Light, (10) SANSE C21GL-AE26 Flowering Glow Light, (11) SANSE C21BB-ZE39/E40 High Bay Light, and (12) BR30 Non-Dimmable LED Light Bulb. Exemplary claim charts provided to Shanghai SANSE in June 2020 show its infringement of each and every element of at least one claim of the '700 patent. *See Exhibits 5, 10 and 11.*

74. In addition, attached hereto as Exhibit 31 is an exemplary chart showing how at least one SANSE LED lighting product—SANSE 6500 lumens, A21 LED bulb, 650 Watt Equivalent, E26, product family C21BB-02E26-35—meets each and every element of at least claim 1 of the '700 patent.

1 C21BB-UE Light Bulb, (7) SANSI C21GL-CE26/27 Full Spectrum Glow Light, (8)
2 SANSI C21GL-AE26 Pull Cycle Glow Light, (9) SANSI C21GL-DE26 Pull Spectrum
3 Glow Light, (10) SANSI C21GL-AE26 Flowering Glow Light, (11) SANSI C21BB-
4 ZE39/E40 High Bay Light, and (12) BR30 Non-Dimmable LED Light Bulb. Exemplary
5 claim charts provided to Shanghai Sansi in June 2020 show its infringement of each and
6 every element of at least one claim of the '608 patent. *See Exhibits 32, 33 and 34.*

7 83. In addition, attached hereto as Exhibit 35 is an exemplary chart showing
8 how at least one SANSI lighting product—SANSI 6500 lumens, A21 LED bulb, 650 Watt
9 Equivalent, E26, product family C21BB-02E26-35—meets each and every element of at
10 least claim 15 of the '608 patent.

11 84. By the foregoing acts, Shanghai SANSI has directly infringed, and
12 continues to directly infringe, literally or under the doctrine of equivalents the '608 patent
13 in violation of 35 U.S.C. § 271.

14 85. Shanghai SANSI has had constructive knowledge of the '608 patent since at
15 least January 25, 2011, the date the '608 patent issued.

16 86. Shanghai SANSI has had actual knowledge of the '608 patent as least
17 through LDG's letter dated June 26, 2020, which provided notice of the '608 patent and
18 its infringement by at least the above identified infringing products. Shanghai SANSI has
19 been on actual notice of infringement of the '608 patent consistent with the requirements
20 of 35 U.S.C. § 287(a) since at least June 26, 2020.

21 87. Shanghai SANSI's infringement of the '608 patent has been and continues
22 to be knowing, willful, deliberate, and intentional, as they has continued its acts of
23 infringement by continuing to make, use, sell, offer for sale, or import into the United
24 States, one or more of the foregoing identified Accused Products after being placed on
25 constructive and actual notice of the '608 patent and its infringement, thus acting in
26 reckless disregard of its infringement of and LDG's rights in the '608 patent.

27 88. Such acts of infringement have caused damages to LDG in an amount to be
28 proven at trial, but in no event less than a reasonable royalty.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, LDG respectfully requests that this Court grant and order the following relief:

- A. Judgment that Defendant, Shanghai SANSEI, has infringed one or more claims of the '923, '807, '700, and/or '608 patents;
- B. An award of damages in an amount adequate to compensate LDG for Shanghai SANSEI's infringement of the '923, '807, '700, and/or '608 patents, no less than a reasonable royalty for such infringement;
- C. A finding that this is an exceptional case under 35 U.S.C. § 285 that warrants an award of attorneys' fees in favor of LDG;
- D. A finding that Shanghai SANSEI's infringement has been willful under 35 U.S.C. § 284 and awarding treble damages;
- E. An award of pre-judgment and post-judgment interest; and
- F. Such other relief as this Court may deem just and proper.

DEMAND FOR JURY TRIAL

LDG requests a trial by jury of all issues raised herein that are triable by a jury.

Dated: January 18, 2023.

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